



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 7, 2021

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Parnas and Kukushkin*, S3 19 Cr. 725 (JPO)

Dear Judge Oetken:

The Government writes to request that the Court order United States Pretrial Services to provide the passports of Lev Parnas and Andrey Kukushkin to the Federal Bureau of Investigation and the United States Attorney's Office for the Southern District of New York. As the Court knows, as a condition of the defendants' pretrial release, the Court ordered that the defendants surrender their passports to Pretrial Services. The Government and the defendants now anticipate that one or more of the parties may seek to offer one or both passports as evidence at the upcoming trial. Therefore, the Government requests that the Court order Pretrial Services to turn the passports over to the Government. The Government will retain custody of the passports until the conclusion of the trial, at which time the Government will return them to Pretrial Services.

Respectfully submitted,

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Cc: Counsel for all trial defendants (by ECF)